

1 [Parties and Counsel Listed on Signature Pages]
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**[PROPOSED] ORDER GOVERNING
DISCOVERY LIMITATIONS
APPLICABLE TO META DEFENDANTS'
PRODUCTION OF HYPERLINK
REQUESTS**

The Court hereby ORDERS the following regarding hyperlink requests by Plaintiffs, pursuant to the Court's Discovery Management Conference on September 6, 2024 and the associated Order issued on September 12, 2024.

1. Meta will produce responsive, non-produced, and non-privileged internal Meta documents found at hyperlinks contained within Meta produced documents within 30 days from requests from Plaintiffs.

2. Plaintiffs' requests will list the specific hyperlinks they are asking for production of, in addition to identifying the document Bates numbers in which each hyperlink appears in accordance with ESI Stip., App'x 1, ¶ 13 Dkt. 623.

3. This applies to documents that are actually hyperlinked in a produced document and does not extend to documents that are merely referenced by name or description in a produced document. This Order does not prevent any party from requesting referenced but not hyperlinked documents and the parties agree to meet and confer in good faith regarding any such requests.

4. Before making a request, Plaintiffs will search Meta's existing productions to confirm they are not able to locate the document themselves.

5. If Meta identifies a requested hyperlinked document in its existing production, it will notify Plaintiffs and identify the produced document Bates number within 3 weeks from receiving the request.

6. Plaintiffs shall be allotted one request, by letter, per week for either up to fifty documents containing hyperlinks or 200 separate hyperlinks, whichever results in a lower number of hyperlinked documents, inclusive of any hyperlink requests for depositions mentioned below.

7. The Parties shall provide the Court with a status update regarding this issue in next month's DMC Statement.

8. For the depositions of M.S. and K.J., scheduled for October 21-22 and October 24-25 respectively, upon completed production of those deponents' custodial files, Plaintiffs shall begin making reasonable weekly hyperlink requests directed at documents related to those deponents. Meta shall commence rolling productions of the requested hyperlinks and shall substantially complete production of the requested hyperlinked documents for these two depositions by no later than October 14, 2024. Plaintiffs committed at the DMC to use appropriate judgment and avoid unduly burdensome requests for

1 numbers of hyperlinked documents, and thus the Court orders Plaintiffs to abide by this commitment.
2 Meta shall communicate transparently with Plaintiffs regarding any specific hyperlinked documents that
3 Meta reasonably believe will be difficult to produce by the October 14, 2024, substantial completion
4 deadline. Meta shall complete its production of the requested hyperlinked documents for these deponents
5 by no later than the Thursday prior to each deponent's scheduled deposition.

6 9. The Court expects the Parties to work collaboratively to identify and prioritize production
7 of reasonable numbers of hyperlinked documents prior to the later-scheduled depositions.

8 10. With each production in response to a request, Meta will provide a crosswalk reflecting:
9 (a) the production number for the document containing the hyperlink; (b) the hyperlinked text identified
10 in Plaintiffs' request; and (c) the production number for the hyperlinked document or a notation reflecting
11 the reason the document is not being produced (e.g., that the link is invalid).

12 11. Nothing in this Order prevents any party from seeking relief from this Order. Should the
13 weekly hyperlink requests become too burdensome for Meta to produce within the 30-day timeline, or
14 should Plaintiffs reasonably require hyperlinks in excess of the parameters set herein or require their
15 production on a timeline different than set herein, the parties agree to meet and confer in good faith and,
16 if necessary, any party may raise the issue with the Court.

17
18 **IT IS SO ORDERED.**

19
20 Dated: October __, 2024

21 MAGISTRATE JUDGE PETER H. KANG

22
23 By: /s/ Lexi J. Hazam
24 LEXI J. HAZAM
25 **LIEFF CABRASER HEIMANN &**
26 **BERNSTEIN, LLP**
27 275 BATTERY STREET, 29TH FLOOR
28 SAN FRANCISCO, CA 94111-3339
Telephone: 415-956-1000
lhazam@lchb.com

1 PREVIN WARREN
2 **MOTLEY RICE LLC**
3 401 9th Street NW Suite 630
4 Washington DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com

5 Co-Lead Counsel

6 CHRISTOPHER A. SEEGER
7 **SEEGER WEISS, LLP**
8 55 CHALLENGER ROAD, 6TH FLOOR
9 RIDGEFIELD PARK, NJ 07660
Telephone: 973-639-9100
cseeger@seegerweiss.com

10 Counsel to Co-Lead Counsel

11 JENNIE LEE ANDERSON
12 **ANDRUS ANDERSON, LLP**
13 155 MONTGOMERY STREET, SUITE 900
14 SAN FRANCISCO, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

15 Liaison Counsel

16 EMILY C. JEFFCOTT
17 **MORGAN & MORGAN**
18 633 WEST FIFTH STREET, SUITE 2652
19 LOS ANGELES, CA 90071
Telephone: 213-787-8590
ejeffcott@forthepeople.com

20 JOSEPH VANZANDT
21 **BEASLEY ALLEN**
22 234 COMMERCE STREET
23 MONTGOMERY, LA 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

24 Federal/State Liaisons

25 MATTHEW BERGMAN
26 GLENN DRAPER
27 **SOCIAL MEDIA VICTIMS LAW CENTER**
28 821 SECOND AVENUE, SUITE 2100

1 SEATTLE, WA 98104
2 Telephone: 206-741-4862
3 matt@socialmediavictims.org
glenn@socialmediavictims.org

4 JAMES J. BILSBORROW
5 **WEITZ & LUXENBERG, PC**
6 700 BROADWAY
7 NEW YORK, NY 10003
Telephone: 212-558-5500
jbilsborrow@weitzlux.com

8 JAYNE CONROY
9 **SIMMONS HANLY CONROY, LLC**
10 112 MADISON AVE, 7TH FLOOR
11 NEW YORK, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

12 ANDRE MURA
13 **GIBBS LAW GROUP, LLP**
14 1111 BROADWAY, SUITE 2100
15 OAKLAND, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

16 ALEXANDRA WALSH
17 **WALSH LAW**
18 1050 Connecticut Ave, NW, Suite 500
19 Washington D.C. 20036
Telephone: 202-780-3014
awalsh@alexwalshlaw.com

20 MICHAEL M. WEINKOWITZ
21 **LEVIN SEDRAN & BERMAN, LLP**
22 510 WALNUT STREET
23 SUITE 500
24 PHILADELPHIA, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

25 Plaintiffs' Steering Committee Leadership

26 RON AUSTIN
27 **RON AUSTIN LAW**
28 400 MANHATTAN BLVD.
HARVEY, LA 70058
Telephone: 504-227-8100

1 raustin@ronaustinlaw.com

2 PAIGE BOLDT
3 **WALSH LAW**
4 4 Dominion Drive, Bldg. 3, Suite 100
5 San Antonio, TX 78257
6 Telephone: 210-448-0500
7 PBoldt@alexwalshlaw.com

8 THOMAS P. CARTMELL
9 **WAGSTAFF & CARTMELL LLP**
10 4740 Grand Avenue, Suite 300
11 Kansas City, MO 64112
12 Telephone: 816-701-1100
13 tcartmell@wcllp.com

14 SARAH EMERY
15 **HENDY JOHNSON VAUGHN EMERY PSC**
16 600 WEST MAIN STREET, SUITE 100
17 LOUISVILLE, KT 40202
18 Telephone: 859-600-6725
19 semery@justicestartshere.com

20 CARRIE GOLDBERG
21 **C.A. GOLDBERG, PLLC**
22 16 Court St.
23 Brooklyn, NY 11241
24 Telephone: 646-666-8908
25 carrie@cagoldberglaw.com

26 RONALD E. JOHNSON, JR.
27 **HENDY JOHNSON VAUGHN EMERY PSC**
28 600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

SIN-TING MARY LIU
AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC
17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR

1 NEW YORK, NY 10001-2170
2 Telephone: 212-372-3030
3 jamesmarsh@marshlaw.com

4 JOSEPH E. MELTER
5 **KESSLER TOPAZ MELTZER & CHECK LLP**
6 280 KING OF PRUSSIA ROAD
7 RADNOR, PA 19087
8 Telephone: 610-667-7706
9 jmeltzer@ktmc.com

10 HILLARY NAPPI
11 **HACH & ROSE LLP**
12 112 Madison Avenue, 10th Floor
13 New York, New York 10016
14 Telephone: 212-213-8311
15 hnappi@hrsclaw.com

16 EMMIE PAULOS
17 **LEVIN PAPANTONIO RAFFERTY**
18 316 SOUTH BAYLEN STREET, SUITE 600
19 PENSACOLA, FL 32502
20 Telephone: 850-435-7107
21 epaulos@levinlaw.com

22 RUTH THI RIZKALLA
23 **THE CARLSON LAW FIRM, PC**
24 1500 ROSECRANS AVE., STE. 500
25 MANHATTAN BEACH, CA 90266
26 Telephone: 415-308-1915
27 rrizkalla@carlsonattorneys.com

28 ROLAND TELLIS
29 DAVID FERNANDES
30 **BARON & BUDD, P.C.**
31 15910 Ventura Boulevard, Suite 1600
32 Encino, CA 91436
33 Telephone: 818-839-2333
34 rtellis@baronbudd.com
35 dfernandes@baronbudd.com

36 MELISSA YEATES
37 **KESSLER TOPAZ MELTZER & CHECK LLP**
38 280 KING OF PRUSSIA ROAD
39 RADNOR, PA 19087
40 Telephone: 610-667-7706
41 myeates@ktmc.com

1 DIANDRA "FU" DEBROSSE ZIMMERMANN
2 **DICELLO LEVITT**
3 505 20th St North
4 Suite 1500
5 Birmingham, Alabama 35203
6 Telephone: 205-855-5700
7 fu@dicelloselevitt.com

8
9 Plaintiffs' Steering Committee Membership
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Plaintiffs' Steering Committee Membership

Attorneys for Individual Plaintiffs

1 **PHILIP J. WEISER**
2 Attorney General
3 State of Colorado

4 /s/ Bianca E. Miyata
5 Bianca E. Miyata, CO Reg. No. 42012,
6 *pro hac vice*
7 Senior Assistant Attorney General
8 Lauren M. Dickey, CO Reg. No. 45773, *pro hac vice*
9 First Assistant Attorney General
10 Megan Paris Rundlet, CO Reg. No. 27474
11 Senior Assistant Solicitor General
12 Elizabeth Orem, CO Reg. No. 58309
13 Assistant Attorney General
14 Colorado Department of Law
15 Ralph L. Carr Judicial Center
16 Consumer Protection Section
17 1300 Broadway, 7th Floor
18 Denver, CO 80203
19 Phone: (720) 508-6651
20 bianca.miyata@coag.gov

21 *Attorneys for Plaintiff State of Colorado, ex rel.*
22 *Philip J. Weiser, Attorney General*

23 **ROB BONTA**
24 Attorney General
25 State of California

26 /s/ Megan O'Neill
27 Nicklas A. Akers (CA SBN 211222)
28 Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
Megan.O'Neill@doj.ca.gov

Attorneys for Plaintiff the People of the State of California

RUSSELL COLEMAN
Attorney General
Commonwealth of Kentucky

/s/ J. Christian Lewis
J. Christian Lewis (KY Bar No. 87109),
Pro hac vice
Philip Heleringer (KY Bar No. 96748),
Pro hac vice
Zachary Richards (KY Bar No. 99209),
Pro hac vice
Daniel I. Keiser (KY Bar No. 100264),
Pro hac vice
Matthew Cocanougher (KY Bar No. 94292),
Pro hac vice
Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
CHRISTIAN.LEWIS@KY.GOV
PHILIP.HELERINGER@KY.GOV
ZACH.RICHARDS@KY.GOV
DANIEL.KEISER@KY.GOV
MATTHEW.COCANOUGHER@KY.GOV
Phone: (502) 696-5300
Fax: (502) 564-2698

Attorneys for Plaintiff the Commonwealth of Kentucky

MATTHEW J. PLATKIN

Attorney General
State of New Jersey

/s/ Kashif T. Chand
Kashif T. Chand (NJ Bar No. 016752008),
Pro hac vice
Section Chief, Deputy Attorney General
Thomas Huynh (NJ Bar No. 200942017),
Pro hac vice
Assistant Section Chief, Deputy Attorney General
Verna J. Pradaxay (NJ Bar No. 335822021),
Pro hac vice
Mandy K. Wang (NJ Bar No. 373452021),
Pro hac vice

Deputy Attorneys General
New Jersey Office of the Attorney General,
Division of Law
124 Halsey Street, 5th Floor
Newark, NJ 07101
Tel: (973) 648-2052
Kashif.Chand@law.njoag.gov
Thomas.Huynh@law.njoag.gov
Verna.Pradaxay@law.njoag.gov
Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiff New Jersey
Division of Consumer Affairs*

1 COVINGTON & BURLING LLP
2

3 By: /s/ Ashley M. Simonsen
4 Ashley M. Simonsen, SBN 275203
5 COVINGTON & BURLING LLP
6 1999 Avenue of the Stars
7 Los Angeles, CA 90067
8 Telephone: (424) 332-4800
9 Facsimile: + 1 (424) 332-4749
10 Email: asimonsen@cov.com

11 Phyllis A. Jones, *pro hac vice*
12 Paul W. Schmidt, *pro hac vice*
13 COVINGTON & BURLING LLP
14 One City Center
15 850 Tenth Street, NW
16 Washington, DC 20001-4956
17 Telephone: + 1 (202) 662-6000
18 Facsimile: + 1 (202) 662-6291
19 Email: pajones@cov.com

20 *Attorney for Defendants Meta Platforms, Inc.*
21 *f/k/a Facebook, Inc.; Facebook Holdings,*
22 *LLC; Facebook Operations, LLC; Facebook*
23 *Payments, Inc.; Facebook Technologies, LLC;*
24 *Instagram, LLC; Siculus, Inc.; and Mark Elliot*
25 *Zuckerberg*

1 **ATTESTATION**
2
3
4

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the
filing of this document has been obtained from each signatory hereto.

5 Dated: September 30, 2024

6 By: /s/ Ashley M. Simonsen

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28